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BARTON WILLMORE

Ribble Valley Core Strategy

Proposed Main Modifications

Representations on behalf of Barratt Homes (Manchester)

1.0 Introduction

1.1 Barton Willmore is instructed by Barratt Homes (Manchester) ("Barratt Homes") to submit representations on its behalf responding to Ribble Valley Borough Council's ("RVBC") proposed Main Modifications to the Local Plan Core Strategy.

1.2 We have been involved in the Examination process on behalf of Barratt Homes, having submitted Hearing Statements in respect of Matters 2 and 3 and attended the related Hearing Sessions.

2.0 Response to Proposed Main Modifications

Main Modification Ref: MM12
Key Statement H1: Housing Provision

2.1 The Inspector's letter to RVBC, of 31 January 2014, confirmed the concerns that we expressed, on behalf of Barratt Homes, at the Matter 2 and Matter 3 Hearing Sessions of the Examination. It was clear that RVBC was pursuing a low growth housing target that would not even come close to meeting the objectively assessed needs for the Borough and, in particular, the economic growth strategy of the Local Plan would not be delivered.

2.2 In this context Barratt Homes welcomes the increase in the overall housing requirement from 250 dwellings per annum (dpa) to 280 dpa over the Plan period. However, we have serious concerns that the requirement remains low, with RVBC pursuing the lowest possible housing target in order to help deliver a low-growth economic led, jobs growth scenario and with a misdirected spatial distribution which still places an over-emphasis on development within lower order and less sustainable settlements. This approach is inconsistent with national planning policy, which

requires Local Plans to enable sustainable development, be positively prepared and to meet the full, objectively assessed needs for market and affordable housing.

2.3 Barratt Homes is also concerned over the way in which the requirement is expressed in Key Statement H1, as modified.

2.4 Our Hearing Statement responding to the Inspector's questions under Matter 2, and our comments at the Hearing Session itself, highlighted the fact that the 280 dpa figure was the *minimum* level of housing growth required in order to deliver the 100 jobs per annum growth "aspiration" of the Council. Our Matter 2 Hearing Statement highlights the fact that the Council's jobs growth forecasting, taken from the *Ribble Valley Employment Land Study 2013*, which is in turn translated into the 280 dpa figure in the *Ribble Valley Housing Requirement Update 2013* ("HRU"), stems from 'Policy Off' economic forecasting. A 'Policy On' approach would take account of the introduction of the Enterprise Zones and the related, accelerated jobs growth that this brings, which according to the HRU is more than three times greater, requiring a higher corresponding level of housing need. Consequently, the 'at least' 280 dpa requirement is based on the lowest possible economic growth scenario, not reflective of the actual 'Policy On' position and an intention to plan positively for future growth, as encouraged within national planning policy.

2.5 The economic forecasting used to determine the various job growth scenarios in the HRU is recessionary based and the significant period of economic sterility thereafter. This means that they are reflective of a period of significant economic decline. The resulting forecasting is therefore potentially artificially low and not reflective of a period of modest economic recovery, which we currently appear to be approaching. Consequently, should conditions for a greater level of job growth materialise, it is likely that a suppressed level of housing growth will limit Ribble Valley's ability to embrace economic growth and take advantage of its benefits, because the declining working age population trend, currently being experienced, will not have been adequately addressed. As a result, by targeting to only meet what is an absolute minimum level of housing growth that is forecast to be necessary, the Core Strategy is not positively prepared, effective nor compliant with national planning policy.

2.6 A further consideration is the recently announced Preston and Lancashire City Deal. The City Deal aims to generate 20,000 new jobs - including 5,000 in the Lancashire Enterprise Zone - and 17,420 new homes and nearly £1bn in economic growth. Also planned are four new roads, a new motorway junction, improved public transport links, new schools, health centres and parks and open spaces. Longridge falls within

the North East Preston City Deal Development Zone (Zone 2) and proposals include a Public Transport Priority Corridor on the route of the B6244/B6243 between Longridge Town Centre and Preston City Centre.

2.7 The Core Strategy's housing and employment land requirements need to reflect the City Deal and LEP proposals to ensure that sufficient land is available, in the right locations, to take advantage of this significant investment. At this point in time, the Core Strategy does not fully take into account how this economic strategy is reflected in its policies – or at least it is not made clear. As expressed above, Barratt Homes considers that the housing requirement of the Core Strategy needs to reflect the Policy On growth modelling of the supporting evidence base which plans for new job creation in the Enterprise Zones. Economic forecasting approach results in a housing requirement of anywhere between 315 and 559 dpa. It is therefore not unreasonable to conclude that a strategy based on fostering economic growth, which aligns with national planning policy, should see a housing requirement in excess of 300 dpa being delivered. By increasing the housing requirement to a figure in this region, the implications are minimal in terms of land-take, but it gives the Plan a greater prospect of helping to deliver a Policy On economic growth scenario, and the homes and population required to meet the projected needs that arise.

2.8 Turning to Barratt Homes' concern over the way in which the increased housing requirement is expressed, it is interesting to note the transformation that the policy wording has undertaken, through various iterations, since it was first drafted. The first draft of the Core Strategy set out a housing requirement of *at least* 200dpa to be delivered over the Plan period. The latest Modification now states the Core Strategy housing requirement as merely a target. To express the housing requirement in this way is contrary to both national planning policy and the RVBC's evidence base.

2.9 National planning policy requires Local Plans to be positively prepared, by seeking to meet objectively assessed needs, and be effective, by being deliverable[1]. If the Core Strategy housing requirement is truly reflect of objectively assessed needs, then the requirement to meet those needs should be strongly expressed *as a minimum* growth target, not merely a target. The evidence base used by RVBC as a basis to justify the Core Strategy housing requirement, the HRU, very clearly expresses the 280 dpa figure as a minimum requirement in order to meet its jobs growth targets. Furthermore, the Inspector's letter to the Council of 31 January 2014 also makes very clear that in order to comply with national planning policy and meet the tests of

[1] Paragraph 182, NPPF

soundness **"a main modification increasing the level of housing growth to an annual average of *at least* 280 [dpa] is necessary"** (our emphasis). A housing requirement in excess of, or above, 300 dpa would be aligned with the Inspector's recommendations and go further to aligning with the Policy On economic growth scenarios.

2.10 Set against the Government's very clear aim to "boost significantly the supply of housing"[2] it is clearly necessary to express any Local Plan housing requirement as a minimum growth target, or alternatively set the requirement higher in the first instance in order to increase the prospects of meeting development needs, unless it is possible to demonstrate that there would be adverse impacts from doing so. No such impacts have been demonstrated, as highlighted by the Inspector in his letter of 31 January 2014. The expression of the housing requirement as we advocate is essential for the Core Strategy to be sound.

2.11 On the basis of our comments set out above, Barratt Homes recommends that Key Statement H1 be modified to a) set a housing requirement at or in excess of 300 dpa and b) express this requirement as an 'at least' figure. This approach would mean that the Core Strategy will have increased prospects of meeting the objectively assessed needs of Ribble Valley.

Main Modification Ref: MM13
Paragraph 6.4

2.12 On behalf of Barratt Homes we object to the proposed modification to remove reference to figures being treated as minimum targets. This text should be reinstated into the Core Strategy as stated by the Inspector in his letter of 31 January 2014.

2.13 We object to the retained reference in paragraph 6.4 of the intention to adopt a phased approach to the release of land, to be set out in a future DPD. Such an approach will restrain rather than boost housing delivery when there is no good reason for doing so. Indeed, the need for a phased approach is unsubstantiated by RVBC and is a matter of fundamental strategic importance that should be clearly set out within the Core Strategy as it pertains directly to the RVBC's ability to meet its housing requirements. There are examples of Local Plan Examination Inspectors finding phasing policies contrary to the NPPF, such as in the case of the Rotherham

[2] Paragraph 47, NPPF

Core Strategy. If the Council contends that a phased delivery of housing is required then it is suggested that the Examination should be reopened to fully test the evidence that such an approach is necessary, particularly as this is likely to demonstrate a need to deliver a figure in excess of the minimum of 280dpa in the early period of the plan. The need to boost housing delivery early in the Plan period could be regarded as justification for introducing a phased approach, providing this is targeted at the most sustainable settlements in the Borough, namely the principal towns, and delivery of housing at or in excess of 300 dpa.

Main Modification Ref: MM20
Policy DME5

2.14 Clarification is required as to what modifications are actually proposed to this policy through MM20 and MM32. MM20 proposes a much more onerous modification to the policy whereby RBVC will now 'require', as opposed to 'request', that major developments provide 10% of their predicted energy requirements from decentralised and renewable or low carbon sources. MM32, however, suggests that the requirement will be deleted from the policy.

2.15 On behalf of Barratt Homes we object to the proposed modification because of the more stringent requirement to deliver carbon reduction in this manner. RVBC will be aware of the Government's intention to reduce local standards for tacking climate change, instead favouring the more stringent regime in place through Building Regulations as the appropriate mechanism (Ministerial Statement by Stephen Williams MP of 13 March 2014). The Building Regulations regime also has the added benefit of regular/annual review rather than a vague and arbitrary target set at a particular point in time in a Development Plan Document, which is then fixed for the life of that particular plan. Barratt Homes is successfully delivering carbon reduction in its developments through the 'fabric first' approach, which has been accepted by numerous local planning authorities as having benefits over the introduction of renewable technologies. The benefits are as follows:

- CO_2 reductions are inherent for the design life of the building (approximately 60 years), whereas low and zero carbon technologies typically have a lifespan of 25 years;

- There are virtually no maintenance and/or replacement costs to maintain CO_2 reductions achieved through fabric first improvements, as opposed to low and zero carbon technologies;
- Low and zero carbon technologies cannot be relied upon to be replaced after a 25 year lifespan, and also have a diminishing performance overt this 25 year period;
- Fabric improvements, and therefore CO_2 reductions, are apparent in 100% of the new built development, rather than a proportion of it, as required to meet policy requirements;
- There is no reliance on occupier's behaviour to ensure potential CO_2 reductions are actually achieved. Low and zero carbon technologies require education, awareness and behavioural changes that cannot be guaranteed; and
- The required behavioural change, maintenance and replacement at end-of-life is beyond the control of both the local planning authority and the developer, and the diminishing performance of the low and zero carbon technology is unavoidable. The situation could therefore arise whereby the technology is only present for 25 years and thereafter is discontinued.

2.16 Notwithstanding the above, at no point within the Core Strategy submission is the requirement to meet a specified level of energy usage or CO_2 reduction justified with robust evidence. Without such evidence the policy cannot be sound. Barratt Homes does not object to a more general policy approach of encouraging measures to make development more efficient in terms of energy usage and reduced CO_2 emissions in line with Building Regulations requirements, which the measures outlined above, as employed by Barratt Homes, would achieve.

2.17 The NPPF lends support to local planning authorities setting local requirements for a building's sustainability which are consistent with the Government's zero-carbon buildings policy and adopt *nationally* described standards[3]. National standards are set out in Building Regulations. The approach of policy DME5 is contrary to national planning policy in this respect, by proposing to adopt local standards that are not reflective of national standards and are otherwise unjustified through the provision of robust evidence. The policy is therefore unsound as proposed.

[3] Paragraph 95, NPPF

Main Modification Refs: MM16, MM21 and MM25
Appendix 2, paragraph 15.2 and Key Statement DS1

2.18 Barratt Homes objects to the above modifications for reasons stated in previous representations relating to the quantum and distribution of housing.

2.19 First and foremost, the Core Strategy continues to express the residual number of dwellings required for each settlement, which can only be up-to-date for a very limited period of time. The table at paragraph 15.2 therefore has little relevance because it will be out-of-date upon adoption of the Plan.

2.20 Turning to MM21 and MM25, and the proposed replacement of Key Statement DS1, Barratt Homes does not object to the updated settlement hierarchy, which now includes the 'Tier 1 Villages', insofar as the settlements identified as Tier 1 Villages are arguably the most sustainable of the category described as 'Other Settlements' in the Submission Draft of the Core Strategy. Notwithstanding this, the proposed re-distribution of development from the Principal Town of Longridge to these less sustainable Tier 1 Villages remains unjustified and contrary to national planning policy.

2.21 The table at the end of DS1 sets out how and where the housing requirement will be delivered, including, once again, a residual figure for each settlement. Barratt Homes is disappointed to note that the Longridge adjustment remains; as previously highlighted in representations, and as stated above, the Longridge adjustment is not supported by robust evidence and we draw the Inspector's attention to those previous comments.

2.22 The Inspector's letter of 31 January 2014 clearly concurs with Barratt Homes' concerns, by stating:

> ***"I do not consider that the re-allocation of 200 homes thorought the 'Longridge adjustment' to the second tier villages is justified."***

2.23 We are disappointed to note that despite the Inspector's concerns, and the concerns expressed at the Examination by a number of participants over the lack of robust evidence to support the Longridge adjustment, RVBC has failed to provide any further evidence at this stage in an attempt to counter those concerns. The only evidence that is provided comes in the form of the documents entitled *'RVBC Core Strategy EiP: Technical Note 2 – Technical Note regarding Longridge Adjustment'* and *'Defining the*

more sustainable settlements and patterns of housing development'. Neither of these documents provide anything new in terms of evidence to justify the principle of the adjustment; they instead focus on the relative redistribution.

2.24 First and foremost, the adjustment, and therefore the Core Strategy, is effectively saying that Longridge cannot accommodate the level of development that would be apportioned to the settlement without the adjustment; in other words, it is imposing a cap on development in Longridge. However, there is no evidence whatsoever of any unacceptable physical, environmental or social implications of proceeding without the adjustment. RVBC's Technical Note 2 even confirms that ***"200 units is considered to be a relatively small number"***[4]. The result is that the policy is not justified and contrary to the direction of national planning policy, which is to boost significantly the supply of housing and to create sustainable communities.

2.25 The result of the adjustment is that 200 dwellings are apportioned to settlements that are markedly less sustainable than Longridge. There is no evidence to demonstrate that such a need exists within these settlements, over and above the existing level of commitments. It is simply poor plan-making to direct development that should be meeting the needs of the principal, most-sustainable settlements, to those settlements within the Borough that are less sustainable and have no evidenced need for the development.

2.26 Barratt Homes' strong objection therefore remains and we consider that the Core Strategy cannot be sound on this basis. If RVBC is to pursue this policy in the face of both the Inspector's comments and the matters raised above, then it is imperative that the Examination is re-opened for Hearing Sessions to debate this issue and to interrogate any evidence that RVBC is relying on as justification for the policy.

Main Modification Ref: MM26
After paragraph 1.4

2.27 Barratt Homes supports, in principle, the proposed modification to include new text within the Core Strategy that commits RVBC to reviewing the Plan's housing requirement within 5 years of adoption. However, the test of a sound Local Plan is that it's evidence base, and resultant policies, are sufficiently robust and flexible to withstanding changing circumstances over the lifetime of the Plan. It is sound plan-

[4] Page 3 (no paragraph numbers provided) - RVBC Core Strategy EiP: Technical Note 2 – Technical Note regarding Longridge Adjustment

making to regularly review the performance of policies, nevertheless, if it should emerge that a review is needed after only 5 years of the Plan period, then the Plan should not have been found sound in the first place. In order to ensure that the housing requirement is sufficient to deliver in varying economic circumstances throughout the lifetime of the Plan, it is essential that the requirement is ambitious and distributes development where it can be delivered most, such as within the most sustainable principal settlements, such as Longridge, and that a range of sites are identified to ensure choice and competition in the market place for land.

2.28 The need for such early review can therefore be avoided by planning more positively for growth in jobs and housing through the adoption of a higher overall housing requirement. If justified, a phased approach to increased levels of housing delivery early in the Plan period, in the principal towns where the required infrastructure already exists, could act as a catalyst to ensuring that the Core Strategy is delivering sufficient development to meet the Borough's needs. A further point of concern is that a review so early would not necessarily allow sufficient time for the Allocations DPD to make an impact on delivery.

Main Modification Ref: MM32
Policy DME5 Paragraph 2

2.29 See our comments under MM20 above in relation to the clarification that his sought over the proposed modifications to this policy.

2.30 Barratt Homes supports the proposed modification to delete the requirement for 10% of predicted energy requirements of development to come from decentralised and renewable or low carbon sources and we suggest that the whole basis and justification for the policy needs to be reviewed to ensure compliance with the NPPF[5], in order to align with nationally described standards, not local standards that, in this case, lack clear justification.

[5] Paragraph 95, NPPF

Main Modification Ref: MM47
Policy DMG1: General Considerations

2.31 Barratt Homes objects to the proposed amendment to policy DGM1. The proposed modification sees the introduction of a new sentence stating that *"Previously developed sites should always be used instead of Greenfield sites where possible."*

2.32 The intention of the new policy wording appears to be a requirement to prioritise the use of brownfield sites over Greenfield sites. This is contrary to the NPPF, which does not support such a sequential approach to the release of land for development. The approach of the NPPF is to encourage the effective use of previously developed land[6] not prioritise it. The NPPG highlights that encouragement for the effective use of previously developed land should come from reducing the burdens of planning obligations, as opposed to prioritising the development of previously development land over Greenfield land[7]. The key message entrenched throughout the NPPF is the delivery of sustainable development, as the 'golden thread' running through both plan-making and decision-taking[8], and the creation of sustainable, inclusive and mixed communities[9]; this is the priority that should be embedded within the delivery of development needs, not the prioritisation of previously developed land which is not necessarily the most sustainable strategy to pursue.

2.33 The proposed modification, and resultant policy, is therefore unsound on the basis that it is contrary to national policy and will most likely restrain housing supply as opposed to boosting it.

[6] Paragraph 111, NPPF
[7] ID 10-025-20140306, NPPG
[8] Paragraph 14, NPPF
[9] Paragraph 50, NPPF

3.0 Response to Further Published Information

3.1 Alongside the proposed Main Modification to the Core Strategy, RVBC has published additional documents that form part of the evidence base of the Plan.

Housing Land Availability Schedule 2014

3.2 We have undertaken a detailed review the Housing Land Availability Schedule 2014 ("HLAS"). The most concerning outcome of our assessment of the document is the errors it contains and unrealistic assumptions it makes over the delivery of housing, leading to the conclusion that upon adoption of the Core Strategy, RVBC will remain in a position that it cannot demonstrate a five year supply of housing. Our initial findings upon reviewing the HLAS lead to the conclusion that the level of supply is, at best, 4.1 years.

3.3 This is a conservative assessment because it assumes some delivery on the Core Strategy Strategic Site at Standen. RVBC granted outline planning permission for the development of the Strategic Site in April 2014; however, the status of the planning permission is currently uncertain as a result of a legal challenge to RVBC's decision. This factor will delay further the Strategic Site coming forward for development. Allied to this is the significant infrastructure required before development can commence, the fact there is currently no preferred developer appointed and the fact that the lengthy exercise of obtaining reserved matters approval and discharge of pre-commencement conditions is yet to begin. For the HLAS to conclude that 300 dwellings will be delivered from the Strategic Site within the next five years is therefore wildly optimistic. We consider that a realistic lead-in time to development, on the basis of the outstanding issues highlighted above, is in the region of three years. With assumed delivery at circa 50 dpa, only 100 dwellings are likely to be completed at this site in the next 5 year period.

3.4 The other major site identified within the supply, Land to the South and West of Barrow and West of Whalley Road, Barrow, was granted planning permission at appeal in February 2014, in outline form, for up to 504 dwellings. As with the Strategic Site, the HLAS assumes delivery of 300 dwellings over the next five years. We similarly consider this assumption not to be soundly based and, again, optimistic to say the least. The site has only just been placed on the market and the process of a developer, or developers, signing up to bring the site forward will take some time. Add to this the period of obtaining reserved matters approval and the fact that

competing schemes are also coming forward in this Tier 1 village[10], and the delivery of the necessary infrastructure to serve the development. We consider the lead-in time to development commencing on this site is likely to be in the region of 2.5 years, meaning that a circa 125 dwellings would be delivered within the next five year period.

3.5 The estimations above are based on experience of the local market. Barratt Homes has significant experience of development within Ribble Valley and is currently active in developing an existing site at Henthorne Road, Clitheroe, which is shared with developers Taylor Wimpey. This site is within the core urban area of the principal settlement within Ribble Valley and is experiencing sales rates of approximately 2.48 units per month, equating to approximately 30 units per annum. Given the location of this outlet, within the largest settlement in Ribble Valley, and the fact that it involves two of the largest developers in the Country, it is considered that the site is a useful benchmark of a committed site delivering at the optimum level.

3.6 This evidence suggests that the assumptions in the HLAS are not reliable. Notwithstanding the lengthy lead-in time stemming from the site preparatory works, infrastructure works, obtaining of reserved matters and subsequent satisfaction of pre-commencement conditions, these two sites would need to deliver 60 dwellings per annum to be delivered within the next five years. In addition to the physical requirement of needing two developers active on site, there is a requirement for a high level of latent demand arising from a significant level of local population within the vicinity of the site, as well as a wide demographic profile and strong developer interest in the site. Given the scale of Barrow as a settlement, there must be considerable doubt as to the level of demand for the development in order to justify the expected level of completions set out in the HLAS.

3.7 Our initial findings discount in the region of 550 dwellings from the HLAS supply, due to a combination of assumptions; including that some sites are expected to deliver in the next five years despite standing dormant with extant planning permissions for some time, a number of historic and duplicate planning permissions are included within the supply, and the lead-in times for the delivery of large sites, as described above, are unrealistic and unachievable.

[10] MM21 and MM25

Consequences

3.8 Having regard to the above, and the general view of the development industry that the Standen site is unlikely to be delivered in full over the Plan period, there needs to be a further, wider review of the Core Strategy's approach to delivering its housing requirement, including the consideration of alternative, additional Strategy Sites.

3.9 This matter was discussed at the Examination Hearing Sessions and the Inspector invited submissions from participants of details of potential further strategic sites. On behalf of Barratt Homes we placed before the Inspector details of its site at Higgins Brook, north of the principal settlement of Longridge, including a site location plan and illustrative masterplan. The first phase of this site is currently the subject of a detailed planning application, under consideration by RVBC, and the remaining land offers significantly more deliverable benefits that will soon be presented in an outline planning application. The scale of this site, for circa 500 dwellings, a new community cricket ground and primary school, is potentially strategic in nature and, more importantly, Barratt Homes is ready to deliver housing on this site. We provide further comments on this recommendation below (section 4.0).

3.10 The inclusion of additional strategic sites will ensure that the Core Strategy can realistically deliver its housing requirement. The evidence currently available, notably the HLAS, does not provide the confidence that this can be achieved, calling into question the effectiveness of the Plan and, consequently, its soundness.

4.0 Recommendation for new Strategic Site at Longridge

4.1 On behalf of Barratt Homes we have expressed a concern within these representations, and on previous occasions at the Examination, that the proposed housing requirement set out in the Core Strategy is likely to be insufficient to meet the full objectively assessed needs of the Borough with particular reference to meeting economic growth strategies that feed into and are reliant upon the Core Strategy. We have also highlighted the fragilities of the proposal to allocated a single, large-scale strategic site, in the form of Standen, not only as a result of the doubts that exist over the delivery of the site in full within the Plan period, but also on the basis of the fact that Standen operates in a single market area requiring substantial sales in a relatively short time period, where competition already exists in the form of other sites that are coming forward.

4.2 Barratt Homes considers it appropriate, to ensure that the Core Strategy's housing requirement will be met, to identify additional strategic sites in alternative sustainable locations to Standen. The town of Longridge is clearly only second to Clitheroe in terms of its scale and the extent of infrastructure, services and facilities required to accommodate strategic growth. Longridge has experienced only very limited growth in recent years, reflected by the worrying statistic that less than 10 new affordable homes have been delivered in the town in the last 10 years.

4.3 Barratt Homes has control of circa 24.8 hectares of land to the North of Longridge ("the Site"), sufficient to provide up to 520 homes, a new cricket ground for Longridge Cricket Club and a new primary school, which can be delivered in full over the Plan period. The Site was included in RVBC's 2013 SHLAA Update and categorised as deliverable with an excellent score against the SHLAA's Sustainability Scoring Criteria; scoring 98 out of a possible 110, the highest of any site in Longridge. The conclusions of the SHLAA reflect the highly sustainable location of the Site, which provides a number of opportunities to link pedestrian and cycle routes to the town centre, the local supermarket and a range of community facilities and employment opportunities.

4.4 Both within the developed area of the Site and land to the North provide excellent opportunities to deliver accessible open space and leisure opportunities. In addition, the land in question, and green corridors throughout the Site, would deliver ecological enhancement measures to deliver environmental benefits.

4.5 The existing cricket ground at Longridge is in need of improvements and the proposed development of Higgins Brook brings with it an opportunity to provide an

entirely new facility for the Cricket Club, which meets English Cricket Board approved standards in terms of dimensions and facilities; including a new pavilion practice nets, stores and car park, all set within strong landscape protection. This facility would be an excellent benefit to the town of Longridge, the local community and the of course the Cricket Club itself, which already has a strong membership base.

4.6 Discussions with Lancashire County Education Authority have revealed the need to increase primary school capacity in Longridge should these development proposals come forward. The Site at Higgins Brook provides an opportunity to provide an entirely new primary school to meet these and future requirements. This is yet another excellent benefit that the development would bring, which is clearly preferable to the situation whereby existing schools would be stretched to capacity with the potential need to provide temporary school accommodation until such time that expansion could be achieved.

4.7 A further benefit of a development of this scale is the delivery up to 156 much needed affordable homes, including homes for the elderly, in a location where affordable housing has historically not been delivered.

4.8 The development of Barratt Homes' Longridge Site would bring economic benefits to the town and wider area. 143 construction jobs over a period of approximately 10 years would be provided, including potential supply chain employment as a result of the construction process. Annual household spending would increase in the local economy by approximately £10.7m per annum, bringing with it the potential for further job creation as a result of the increased local expenditure. Local leisure and community groups would also see membership numbers increase, to the benefit of their longevity and economic standing.

4.9 The Site is not constrained by any landscape, ecological or heritage designations, and the developable area of the Site has been carefully considered through landscape and visual assessment at an early stage, ensuring that existing strong boundary lines are retained and enhanced by the development proposals, thereby reducing its impact upon the surrounding countryside.

4.10 The enclosed illustrative masterplan (Appendix 1), which is updated from Barratt Homes' July representations, shows the results of a well-planned urban-design approach to the development of the Site. The illustrative layout applies green infrastructure to the more sensitive development extremities, with increasing density to the areas of the Site that are more related to the existing settlement. Full use is made of existing points of potential non-vehicular access and a logical and attractive

green network of footpaths and cycle ways link together the various character areas of the Site.

4.11 Access to the Site via Chipping Lane to the east requires only limited off-site improvement works, thereby limiting infrastructure delivery requirements before development can commence.

4.12 As stated above, a detailed planning application has already been submitted to RVBC for the first phase (106 units) of the development and an outline planning permission has now been lodged with RVBC for the scheme detailed in Appendix 1.

4.13 The important asset of this Site is the fact that construction work could commence, with the necessary consents in place, in a relatively short period of time, meaning that it can be delivered in full within the Plan period. These are all important credentials for a strategic site and clearly justify the allocation of Higgins Brook as such in this instance.

4.14 Should it not be deemed necessary or desirable for the Inspector to recommend or explore the allocation for further strategic sites within the Core Strategy, then consideration should be given to designating a broad location for strategic development on the Key Diagram for the area north of Longridge.

4.15 We trust that these submissions will be given detailed consideration in the Inspector's on-going assessment of the soundness of the Core Strategy.


Paddock
Paddock
Proposed
Cricket Pitch
Primary
School
e*SCAPE